

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

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In re: Equifax Inc. Customer Data  
Security Breach Litigation

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MDL No. 17-2800-TWT

CONSUMER ACTIONS

THEODORE H. FRANK and  
DAVID R. WATKINS,

Chief Judge Thomas W. Thrash, Jr.

Objectors.

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**REPLY IN SUPPORT OF AMENDED MOTION OF OBJECTORS  
THEODORE H. FRANK AND DAVID R. WATKINS TO RETURN  
PORTION OF APPEAL BOND**

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On January 19, 2022, Objectors Theodore H. Frank and David R. Watkins requested that this Court order the Clerk to return to them their \$4000 Fed. R. Civ. P. 7 appeal bond less the plaintiffs' taxable costs. Dkt. 1223. Since then, we have learned that \$140.26 of plaintiffs' \$420.75 costs have already been satisfied by the one-sixth shares of Appellant-Objectors West and Davis. Dkt. 1227 at 1. And Appellant-Objectors Huang and Cochran have agreed that their \$70.13 shares can be withheld from the return of their posted bonds. Dkts. 1211, 1228.

Thus, to avoid an improper double recovery on plaintiffs' costs, Frank and Watkins now request that the Court order the clerk to return their \$4000 bond less \$140.26 (the amount of plaintiffs' costs that will remain unsatisfied if Huang and Cochran's motions are granted to return \$1929.87 to them). This

equates to a return of \$3859.74 and is reflected in an amended proposed order attached here.

Frank and Watkins reserve their rights to privately collect the \$70.13 ostensibly unpaid share of the appellate costs from the co-appeal of Mr. Andrews.

WHEREFORE, objectors Theodore H. Frank and David R. Watkins move the Court to remit \$3859.74 back to their possession.

Dated: February 2, 2022.

/s/ Adam E. Schulman

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and Theodore H Frank*

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed with this Court via its CM/ECF service, which will send notification of such filing to all counsel of record.

Dated: February 2, 2022.

/s/ Adam E. Schulman